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SSIC NO. 5090.3

June 26, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
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DRAFT PHASE II WORK PLAN FOR THE MULTI-PHASE EXTRACTION (MPE) PILOT STUDY, OPERABLE UNIT (OU) 3, INSTALLATION RESTORATION PROGRAM (IRP) SITE 16, CRASH CREW TRAINING PIT NO. 2, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above report dated June 2000, and received by this office on June 12, 2000. The draft report presents the work plan for the MPE pilot study to be conducted for IRP Site 16, Crash Crew Training Pit No. 2.

After review of the work plan, DTSC has the following comments:

1. Page 4-1, Section 4.2 - MPE Pilot Study Objectives: The Work Plan notes that soil gas samples for methane and fixed gases will be collected and analyzed to assess biological activity. DTSC supports the collection of the samples; however, it is important to acknowledge the limited utility of the resultant data which essentially represent conditions at a fixed point in time. Long term trends are more important in evaluating biological activity. Also note that the pre-pilot test samples will likely reveal anaerobic subsurface conditions, while the post-pilot test samples likely will show aerobic conditions to some degree. Thus, the pre- and post-pilot test data will be difficult to interpret. The meaningful evaluation of subsurface biological activity will require a much more comprehensive and longer term sampling program.
2. Page 4-16, Table 4-2 - SVE [Soil Vapor Extraction] System Operating Parameter

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Measurements: DTSC recommends that volatile organic compounds (VOCs) in the effluent from the first granular activated carbon (GAC) canister be measured each time the effluent of the second GAC canister (GAC effluent) is measured. Monitoring of VOCs from the first GAC canister will provide information on the on VOC loading and may provide advanced warning of breakthrough.

3. Page 4-16, Table 4-2 - SVE System Operating Parameter Measurements: For consistency with the text on Page 4-12 please include the information for field monitoring of organic vapor concentrations from the extraction well (16MPE1) in Table 4-2.
4. Page 4-24, Section 4.8 - Soil Gas Sampling: The second paragraph states, "Soil gas sampling procedures and quality control are described in detail in the FSP [Field Sampling Plan] (Appendix A).

Please revise to show that the FSP is included in Attachment A rather than Appendix A.

Additionally, the collection method described does not correspond to the method described in the Regional Water Quality Control Board (RWQCB) guidance included in Appendix A. The RWQCB guidance states that soil gas samples collected in tedlar bags are only appropriate for qualitative analysis. Please clarify.

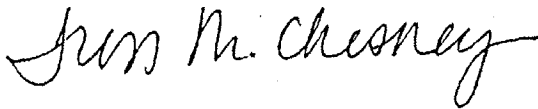
A standard operating procedure that describes the methods and procedures to be followed for soil gas sampling as summarized in Section 4.8 and Section 5.4 of the FSP in Attachment A needs to be included.

5. Attachment A - Field Sampling Plan, Page A4-3, Table 4-2: This table indicates that soil gas samples will be collected before and after the pilot test. The soil gas sampling procedures need to specify the procedure for calculating the initial purge volume, purge rate and method and the collection of representative samples of the vapors in the vadose zone.

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If you have any questions, please contact me at (714) 484-5395.

Sincerely,



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